



U.S. Department
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**Research and
Special Programs
Administration**

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NOV 29

REGULATORY AUTHORITY
DOCKET ROOM

Mr. Glynn Blanton
Chief, Gas Pipeline Safety Division
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Dear Mr. Blanton:

On June 18, 2002, the Tennessee Regulatory Authority (TRA) notified the Office of Pipeline Safety (OPS) that it had approved, as amended, the application of the Nashville Gas Company (NGC), a Division of Piedmont Natural Gas Company, Inc., for a waiver from the requirements of Title 49 CFR §§ 192.121 and 192.123(a).

In a letter dated August 14, 2002, OPS objected to the waiver and under 49 U.S.C 60118(d), TRA's action granting the NGC waiver was stayed. In that letter, OPS indicated that it would reconsider the objection if TRA provided additional information.

In a letter dated September 5, 2002, TRA provided the requested additional information to OPS. Based on your letter and the technical information provided by NGC, the following is our understanding of the critical issues:

1. NGC will install defect free PA11 plastic pipe in accordance with written procedures submitted to TRA. The installation of PA11 plastic pipe will be in a class 3 location and consist of 3 miles of 1-inch IPS service tubing and 2 miles of 2-inch IPS main line. The installation is for a trial period not to exceed 30 months.
2. The maximum allowable operating pressure for this piping system will be limited to 175 psig for the duration of the waiver. OPS concurs with TRA's reasoning that the information provided from a 0.40 design factor will provide valuable operational and plastic pipe design information to both the regulatory and industry community alike.
3. The TRA Gas Pipeline Safety staff will be present during the installation of all service lines, hot taps, and removal of test coupons. Only SDR 11 mechanical tap tees will be used while performing hot taps on PA11 plastic pipe material.
4. NGC will remove sections of the PA11 plastic pipe for testing and evaluation at twelve (12) and twenty-four (24) month periods from the date of installation. Tests will be performed with the Gas Technology Institute to insure that the PA11 plastic pipe continues to be free from defects and meet the requirements of ASTM D2513-96a. If test

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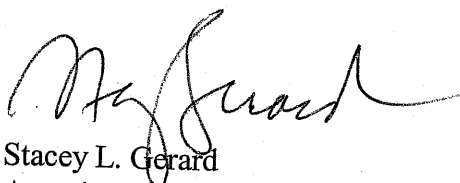
results indicate that the PA11 plastic pipe material does not meet the requirements of ASTM D2513-96a and is unsafe, the pipeline shall be replaced, repaired, or removed from service.

5. Provided the test results of the pipe material show that the PA11 plastic pipe material has remained defect free, the PA11 plastic pipe may continue to operate with a MAOP of 175 psig for a period of not more than 6 months after the 24 month period. After such time, the MAOP of the PA11 plastic pipe material will be lowered to 100 psig.

The results of the tests will be filed with TRA and made available to OPS upon request.

Based on the above representations, we are withdrawing our objection and the waiver may take effect as planned.

Sincerely,

A handwritten signature in black ink, appearing to read "Stacey L. Gerard", written in a cursive style.

Stacey L. Gerard
Associate Administrator
for Pipeline Safety